

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BLAKE LIVELY,

Plaintiff,

-v-

WAYFARER STUDIOS LLC, JUSTIN
BALDONI, JAMEY HEATH, STEVE
SAROWITZ, IT ENDS WITH US MOVIE LLC,
MELISSA NATHAN, THE AGENCY GROUP PR
LLC, JENNIFER ABEL, JED WALLACE, and
STREET RELATIONS INC.,

Defendants.

Case No. 1:24-cv-10049-LJL
(consolidated with 1:25-cv-00449-LJL)

JENNIFER ABEL,

Third-Party Plaintiff,

-v-

JONESWORKS LLC,

Third-Party Defendant.

WAYFARER STUDIOS LLC, JUSTIN
BALDONI, JAMEY HEATH, IT ENDS WITH US
MOVIE LLC, MELISSA NATHAN, JENNIFER
ABEL, and STEVE SAROWITZ,

Consolidated Plaintiffs,

-v-

BLAKE LIVELY, RYAN REYNOLDS, LESLIE
SLOANE, VISION PR, INC., and THE NEW
YORK TIMES COMPANY.

Consolidated Defendants.

**DECLARATION OF KEVIN A. FRITZ IN SUPPORT OF THE WAYFARER
PARTIES' MOTION FOR LEAVE TO SERVE THIRD PARTY
ISABELLA FERRER BY ALTERNATIVE SERVICE**

I, Kevin A. Fritz, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney admitted to practice before this Court, a partner in the law firm of Meister Seelig and Fein PLLC, 125 Park Avenue, 7th Floor, New York, New York 10017, and counsel of record for Defendants Wayfarer Studios LLC, Justin Baldoni, Jamey Heath, Steve Sarowitz, It Ends With Us Movie LLC, Melissa Nathan, The Agency Group PR LLC, and Jennifer Abel (collectively, the “Wayfarer Parties”) in the above-captioned action.

2. I respectfully submit this declaration in support of the Wayfarer Parties’ Motion for Leave to Serve Third-Party Isabella Ferrer by Alternative Service.

3. Isabella Ferrer played the role of Young Lily Bloom on the set of the film *It Ends With Us* and is a material witness.

4. Sanford L. Michelman, Esq. of Michelman & Robinson, LLP has advised counsel for the Wayfarer Parties, in writing, that he represents Isabella Ferrer in connection with the dispute at issue herein.

5. A true copy of a subpoena *duces tecum* (the “Subpoena”) directed to Isabella Ferrer is attached as **Exhibit A**.

6. In an email delivered on July 3, 2025, the Wayfarer Parties’ counsel asked Sanford L. Michelman, Esq. to accept service of the Subpoena (which was attached thereto). He failed to respond. A true copy of the July 3, 2025 email is attached as **Exhibit B**.

7. On July 8, 2025, the Wayfarer Parties’ counsel again requested that Sanford L. Michelman, Esq. accept service of the Subpoena. Again, he failed to respond. A true copy of the July 3, 2025 email is attached as **Exhibit C**.

8. On several occasions in early August 2025, and at various times of day, a process server attempted to serve the Subpoena upon Isabella Ferrer at an address in Brooklyn, NY which the Wayfarer Parties' counsel understood was her residential address. Based upon the Affidavit of Due Diligence dated August 11, 2025, it appears that none of the persons present at the Brooklyn location were familiar with Isabella Ferrer. A true copy of the Affidavit of Due Diligence dated August 11, 2025 is attached as **Exhibit D**.

9. Moreover, on several occasions in early August 2025, and at various times of day, a process server attempted to serve the Subpoena upon Isabella Ferrer at an address in Sag Harbor, NY which the Wayfarer Parties' counsel understood was another residential address for her. Based upon the Affidavit of Due Diligence dated August 11, 2025, the process server was unable to serve the Subpoena upon Isabella Ferrer at the Sag Harbor address. A true copy of the Affidavit of Due Diligence dated August 11, 2025 is attached as **Exhibit E**.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: August 12, 2025
New York, NY

/s/ Kevin A. Fritz
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